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*Attorneys for Plaintiff LT Game  
International Ltd.*

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

LT GAME INTERNATIONAL LTD.,

Plaintiff,

v.

SHUFFLE MASTER, INC.,

Defendant.

CASE NO. \_\_\_\_\_

**COMPLAINT**

**JURY TRIAL DEMANDED**

Plaintiff LT Game International Ltd. ("Plaintiff") for its Complaint against Defendant Shuffle Master, Inc. ("Defendant") alleges as follows:

**PRELIMINARY STATEMENT**

1. This is an action for unfair competition under federal law, the State of Nevada common law, Macau commercial code and tortious interference with prospective business and contractual relations.

**PARTIES**

2. Plaintiff is a company incorporated under the law of Ontario, Canada and is located at 4350 Steeles Ave. E, Market Village, Box 15 2/F, Unit A103 Markham Ontario L3R 9V4 Canada.

3. Plaintiff is the exclusive agent and licensee of LT Game Ltd.'s technology, intellectual property and products in North America including Las Vegas, Nevada.

## **JURISDICTION AND VENUE**

6. The Court also has subject matter jurisdiction over this action pursuant to 28 U.S.C. §1332, as the controversy is between citizens of different states, and the amount in controversy exceeds \$75,000, exclusive of interest and costs.

8. Defendant is headquartered in this Judicial District and accordingly is subject to the Jurisdiction of this Court.

9. The Plaintiff is in the business of marketing and sale of technologically innovative gaming and casino products to customers in North America and in Las Vegas, Nevada.

11. Over the past year, Defendant has begun an international campaign of disparagement of Plaintiff and its products and has directly and indirectly interfered with Plaintiff's business and potential business activities, dealings and contracts with customers in the United States and in Las Vegas, Nevada.

12. Defendant has made misrepresentations about the Plaintiff and its products at international trade shows and directly and indirectly to Plaintiff's current and prospective customers in the gaming and casino industry around the world and in Las Vegas, Nevada,

1 including but not limited to such customers as the Venetian and Sands, that have undermined  
2 and negatively impacted Plaintiff's business reputation and prospective deals and contracts.

3 13. Defendant is engaging in this course of action willfully and with full knowledge  
4 and intent to interfere and damage Plaintiff's business deals with its current and prospect  
5 customers.

6 14. Plaintiff has no adequate remedy at law.

7 **COUNT I – UNFAIR COMPETITION (LANHAM ACT)**

8 15. Plaintiff repeats each and every allegation set forth herein in the preceding  
9 paragraphs as though fully set forth herein.

10 16. Defendant's aforesaid activities constitute unfair competition under the federal  
11 Lanham Act.

12 17. Defendant's aforesaid activities have damaged and cause irreparable harm to the  
13 Plaintiff.

14 **COUNT II – UNFAIR COMPETITION (NEVADA COMMON LAW)**

15 18. Plaintiff repeats each and every allegation set forth herein in the preceding  
16 paragraphs as though fully set forth herein.

17 19. Defendant's aforesaid activities constitute unfair competition under State of  
18 Nevada's common law.

19 20. Defendant's aforesaid activities have damaged and cause irreparable harm to the  
20 Plaintiff.

21 **COUNT III – UNFAIR COMPETITION**  
22 **(MACAU LAW - COMMERCIAL CODE)**

23 21. Plaintiff repeats each and every allegation set forth herein in the preceding  
24 paragraphs as though fully set forth herein.

25 22. Defendant's aforesaid activities constitute unfair competition under Macau  
26 Commercial Code Articles 156-173, Title X, Book I.

27 23. Defendant's aforesaid activities have damaged and cause irreparable harm to the  
28 Plaintiff.

**COUNT IV- TORTIOUS INTERFERENCE WITH CURRENT AND PROSPECTIVE  
BUSINESS AND CONTRACTUAL RELATIONS**

24. Plaintiff repeats each and every allegation set forth herein in the preceding paragraphs as though fully set forth herein.

25. Plaintiff has been in communications and negotiations with current and prospective customers for sale of its gaming and casino products.

26. Defendant has been aware of these communications and negotiations.

27. Defendant, directly and through its agents, has made false claims and misrepresentations regarding the Plaintiff and its products in order to undermine, interfere and obstruct the Plaintiff from making business relations, deals and contracts for the sale of its products with its current and prospective customers.

28. Defendant's aforesaid actions have undermined and damaged Plaintiff's business relations with its current and prospective customers and have resulted in the loss of business deals and contracts.

29. Defendant's aforesaid activities have damaged and caused irreparable harm to the Plaintiff.

**REQUESTED RELIEF**

**WHEREFORE**, Plaintiff prays that:

A. Defendant, its agents, servants, employees, franchisees, licensees, attorneys and all others in active concert or participation with Defendant, be enjoined and restrained, permanently from:

1. Making any false or misleading representation regarding the Plaintiff and/or their products to the public, the gaming and casino industry, and any current or prospect customer of the Plaintiff.

2. Unfairly competing with the Plaintiff in any manner.

B. Plaintiff recovers Defendant's profits, as well as the damages sustained by Plaintiff as a result of Defendant's unlawful actions, such amount of profits and damages to be trebled;

1 C. Defendant be required to pay Plaintiff the costs of this action, together with  
2 reasonable attorneys' fees and disbursements;

3 D. Plaintiff be awarded statutory damages pursuant to the Lanham Act; and

4 F. This Court award Plaintiff any other relief that this Court deems just and proper.

5 **DEMAND FOR JURY TRIAL**

6 Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff demands a trial by  
7 jury of all issues properly triable by jury in this action.

8 RESPECTFULLY SUBMITTED this 10<sup>th</sup> day of July, 2012.

9 McDONALD CARANO WILSON LLP

10  
11 By: /s/ Amanda C. Yen

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